J. H. BAXTER & CO. P.O. Box 305 Arlington Washington 98223 Phone 6 435 2146

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MK
JAS

J Baxter

July 24, 1984

Ms. Julie Sellick, H.W. Inspector/ Specialist
State of Washington
Department of Ecology
4350 150th Ave. N.E.
Redmond, Wa. 98052

Dear Ms. Sellick,

Ref. your letter of 7/12 requesting copies of contingency/ training plans.

Per your request, I have enclosed copies of the J.H. Baxter & Co., Arlington facility contingency and training plans.

Please advise if futher information is required.

Sincerely,

J.H. Baxter & Co.

Michael C. Spies
Plant Manager

cc: L.G. Hope - San Mateo
Joe Morgan - San Mateo

MCS:rh

1/24 To: Julie Sewick State DEC Redmond

J. H. BAXTER & CO.
RCRA COMPLIANCE PLAN

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OIL SPILL REPORTING PROCEDURE

Any employee finding an oil spill should immediately report it to his supervisor, the treating department, the maintenance department and the plant manager. After the senior plant personnel have made sure corrective measures have been taken and the clean up effort started, San Mateo should be notified.

San Mateo should be notified as soon as possible, but no later than 10-12 hours of finding the spill. If the spill has to be reported to the authorities, it must be done within 24 hours and preferably sooner. If San Mateo personnel cannot be reached at the office or at home, the senior plant personnel should report the spill if it has left the plant site. This should be done within 10-12 hours after the spill is discovered.

The phone numbers needed are listed below.

PLANT NUMBERS	NAME	OFFICE	HOME
Plant Manager	M. C. Spies	206/435-2146	(b) (6)
Asst. Plant Manager	Don Mansfield	"	
Treating Supervisor	Douglas Howell	"	
Yard Supervisor	Robert Crane	"	

SAN MATEO NUMBERS			
Tech. Director	Joe Morgan	415/349-0201	(b) (6)
V.P.-Operations	Lapsley Hope	"	
President	Bill Martinell	"	

ENVIRONMENTAL AUTHORITIES		
EPA - National Response Center		800/424-8802
State Agency -	In State	206/442-1263
	Out of State	"

SECTION II, PART 265
INTERIM STATUS STANDARDS FOR OWNERS & OPERATORS
OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES

265.1

All generators, storers, transporters, treaters and disposers of hazardous waste must have an EPA supplied identification number. Your plant's identification number is WAD053823019

265.13

While the processes producing J. H. Baxter's & Co. waste are batch processes, these processes and the waste products are relatively constant. There has been a considerable amount of documentation given to EPA to support this.

Therefore, it is felt a yearly analysis of each plant's waste streams will suffice to characterize the waste. More frequent analyses will be run if the Technical Director and respective plant manager feels it is necessary.

In order to obtain a representative sample from our waste streams, the appropriate ASTM or EPA protocol will be used in sampling. Copies of these protocols will be attached to each plant's sampling plan when the copies are received.

The Company's hazardous waste streams are detailed below:

1. U-051 - creosote contaminated sludges and spill clean up residues.

2. K-001 - wastewater sludge from creosote wastewater treating operations. The analytical tests for these sludges will be a modified American Wood-Preservers' Association (AWPA) extraction procedue to determine the creosote, solids and water content. Literature sources can be used for actual creosote constituent breakdown, as there has been ample research done on this in the past.

3. U-242 - pentachlorophenol contaminated sludge and spill clean up residues.

4. K-001 - wastewater sludge from treatment of pentachlorophenol containing wastewaters. Analysis for Penta can be done either by oil extraction, such as the American Public Health Association's Standard Methods oil and grease extraction and using a 6.5% Penta as a factor, or Penta analysis can be run by lime ignition or an X-ray, such as found in AWPA.

5. D-004 - arsenic-contamined sludge or spill clean up residue from ammoniacal chromated arsenate (ACA) processes. This can be tested using either Standard Methods, silver diethyldithiocarbamate colorimetric method, of an X-ray analysis, such as that used in the Company's quality control methods, which is found in the AWPA manual. The analysis should be done on the extract after an E.P. toxicity is done on the sludge. Atomic absorbtion is the recommended analytical method, if available.

6. D-007 - chromium contaminated sludge and spill residue clean up from chromated zinc chloride treating processes. This will be analyzed by an EPA extraction procedure followed by Standard Methods permanganate oxidation, colorimetric analysis or an X-ray analysis, such as used in the AWPA quality control manual, depending upon the concentration involved.

It should be pointed out that all of these materials are sludges and are mixtures of dirt, sawdust, etc. Therefore, these materials are not as hazardous as the pure concentrated chemicals.

The plants will be responsible for labeling each barrel as it is filled and not mixing the various wastes, insofar as practical. Labeling information is detailed below.

WASTE TYPE	EPA #	D.O.T. #	D.O.T. DESIGNATION
Creosote wastewater sludge	K-001	NA-1993	Combustible
Penta wastewater sludge	K-001	NA-2020	ORM-E
Creosote spill clean up, tank residue	U-051	NA-1993	Combustible
Penta spill clean up, tank residue	U-242	NA-2020	ORM-E
Arsenic acid spill clean up	P-010	UN-1557	Poison "B"
Arsenic Pentoxide	P-011	UN-1557	Poison "B"
Arsenic Trioxide	P-012	UN-1557	Poison "B"
Arsenic contaminated material, i.e. sludges, treated wood waste	D-004	UN-1557	Poison "B"
Chromium contaminated material, i.e. sludges	D-007	NA-1479	ORM-A

265.15 - General Inspection Requirements

RCRA CHECKLIST INSTRUCTIONS

The Resource Conservation and Recovery Act (RCRA) requires that all generators, treaters, storers and disposers of hazardous waste keep a daily checklist on equipment and systems which handle hazardous waste. By definition in the Federal regulations, the wastewater sludge from the treatment of Penta and/or creosote plant effluent is a hazardous waste. Also, the sludge from ACA or CZC treating operations is a hazardous waste.

Attached are four checklists. The first is not filled in for equipment to be checked. This can be used as a supplement to the other generalized lists if you decide you need extra space.

The second form is a treating checklist. This checklist is mainly concerned with leaks. Leaks add preservatives and/or chemicals and water to the water pollution projects, which generate emulsions and other problems. These problems make trouble and extra work for you, and can cause the company a lot of money. We want to stop leaks.

This form also requires information on dike condition in the unloading areas, and the tank farms or the Spill Prevention Control and Countermeasure (SPCC) areas. It is essential that these dikes be maintained in good order. One of the most serious things that can happen at a plant is to have a preservative or other chemical spill which leaves the plant site. The dikes are our last line of defense against such a spill.

If these dikes have a rainwater relief valve, it should be kept locked at all times, except when non-contaminated water is being released under responsibile supervision.

This form also has a section for the condensate return operation. The condensate return saves water, chemicals and energy. We are most concerned with reducing water volume for this RCRA work, but the chemical and energy savings are also important.

The third form is a water pollution checklist. This list is designed for actual equipment and system operation, as well as leaks.

The fourth form, Hazardous Waste Container Record, is a record to help keep track of storage time, contents and shipping dates.

To fill out these forms, a daily inspection is required. If the equipment is functioning correctly, a check should be placed in that equipment's or system's box for that day. If a problem exists, a number should be entered in the box with a correspondingly numbered explanation written on the back of the page, which has a space for comments. The problem should be

detailed, dated, and the solution should be entered and dated also. If the same problem exists on the same piece of equipment for several days, then the same number could be used for those days. However, once a problem is fixed, that number can no longer be used in that month.

For instance, if a pump packing starts to leak badly, and this is the first problem in the month, the number "1" would be entered in the block labeled "Treating Room Leaks" - Sub part "Pumps" on day one.

If the same problem is occurring on day two, the same number "1" should be entered there. On day three, assume the leak is fixed. On the back of the sheet, the first line labeled "1", the explanation would be "Number two cylinder fill pump packing is worn out, and the pump is leaking." Since the same problem exists for day two, no additional explanation would be needed, until day three. On day three, on the back, using the same line as the problem, a simple notation to the effect that the pump packing was replaced and the leak stopped on day three could be entered. On day four, if there are no further problems with pumps, a check mark could be placed in the box for number four.

The next problem encountered during that month would be number "2", the next problem, "3", and so on down the line.

If several pieces of the same type of equipment are giving problems on the same day, several different numbers could be written in a day's block, with correspondingly numbered explanations written on the back. A partially filled out example page for the treating room sheet is included in the attachments.

These are Federal regulations which require that these sheets be kept. Therefore, a diligent effort is needed to make sure this paperwork is done correctly. To assist you in doing this correctly, the Environmental Department will come to each plant and conduct inspections with the person assigned to this project. If you have questions on these forms before an explanation can be given, please feel free to send a telex to the Technical Director's office in San Mateo and we will call you and discuss your problem with you.

265.16 - Personnel Training

All facility personnel have attended a classroom instruction which dealt with identification of hazardous wastes, improved maintenance for leaks, spills, etc., requirements of cradle-to-grave disposal, security and reporting any safety or environmental hazards they might see.

In addition, the seminar dealt with how employees could limit their exposure to various chemicals by good personal hygiene, such as daily showers, washing of hands before eating, wearing

clean clothes and appropriate safety equipment as needed.

This seminar also dealt with symptions of preservative poisoning and the possibility of exposure to suspected cancer-causing compounds in the work place and their relative importance in the employees' exposure and use of carcinogens at work and at home. A copy of this seminar program is attached, as Attachment 6. This program will be reviewed with the employees on a yearly basis. In addition, personnel hygiene will be emphasized at the plant safety meetings.

In addition, each plant has an effective, on-the-job training program that teaches their employees to do their jobs in a safe effective manner.

Each plant has a list of all employees who have participated in these programs. All new employees will be given a lecture and the normal on-the-job training before starting their job. Records will be kept of these training programs in the permanent employee file for a minimum of three years after the employee last worked at the plant.

SUBPART C
PREPAREDNESS & PREVENTION

265.31

This facility is maintained and operated in order to minimize any possibility of an accident involving hazardous wastes or preservative spillage.

265.32 - Required Equipment

All company plants have a fire alarm system capable of directing employees toward their emergency station.

The plant has a comprehensive fire control system and employees are familiar with its use.

The plant has a telephone system available to call outside emergency help if needed.

265.33 - Testing and Maintenance of Equipment

All emergency equipment is tested and maintained in order to insure proper operation.

265.34

There is adequate access to the communication and alarm systems for emergency use.

265.37 - Arrangements with Local Authorities

Because of the location of this facility's wastewater sludge which is either in the bottom of a settling or work tank in a diked tank farm, or in a barrel awaiting shipment, the probability is extremely low of spills of the magnitude requiring outside assistance. Therefore, it is not considered necessary for this facility to have elaborate arrangements with local emergency response teams, fire departments, police departments and hospitals.

In the plant's normal operations, over many years, local authorities are well aware of the plant's location and layout.

In addition, employees, due to their training, use safe procedures in handling both preservatives and hazardous wastes. Because of the relatively low toxicity of the preservative and our hazardous wastes, virtually all cases of injury on the plant are due to slips, falls or other types of mechanical injury, rather than exposure to hazardous materials.

SUBPART D
CONTINGENCY AND EMERGENCY PLANS

The Spill Prevention Control and Countermeasure Plans as currently written, with the addition of certain supplements, satisfy the requirements of this subpart.

265.52

The additions are:

1. A list of names and phone numbers for emergency personnel. The emergency coordinator at each plant will be the respective plant manager.

   If the plant manager is unavailable, then the normal chain of command dealing with preservatives would be followed which would be the assistant plant manager, treating supervisor and maintenance supervisor. These people would be responsible for beginning the clean up and notification of the San Mateo office in case of a spill.

2. The plant will be responsible for developing a list and location of emergency equipment.

3. The plant will be responsible for setting up an evacuation procedure. Generally, this would involve setting up an agreed-upon signal where the employees would go to their department's emergency station and the departmental supervisor would then check to make sure that all employees are present, and the plant could be evacuated in whatever order the plant manager deems best. This

plan would be activated only due to some urgent emergency; such as imminent explosion or natural disaster. This plan would have to include emergency shutdown procedures for the plant equipment, such as boilers, etc.

265.53

Copies of the plant's SPCC plan should be given to the various memebers of the plant's staff who could be called upon to act as the emergency coordinator. They should be thoroughly familiar with the plan.

265.54

In the event the contingency plan is found to be inadequate, it will be amended as needed.

265.56 - Emergency Procedures

In the event of an emergency, the plant manager will evaluate the situation as to the severity of danger to human health or environment and will notify the appropriate members of J. H. Baxter's staff and/or outside agencies as needed.

As a matter of Company policy, the emergency coordinator is authorized to take whatever measures are needed to prevent hazardous wastes' spillage from leaving the plant property. If it does leave the plant property, then he is authorized to take whatever means is necessary to minimize the spread. In either case, the recovered hazardous material would be stored on the plant property until arrangements could be made with the nearest hazardous waste disposal site for disposal.

After any such incident, the emergency equipment will be readied for use in case another emergency should arise. In addition, all appropriate State and Federal officials would be notified before operation is resumed after any such incident which seriously threatened human life of the environmentl. This would apply to a major spill of either hazardous waste and/or one of the plant's preservatives, fuel oil or other chemicals. This would not apply to minor spillage, etc. If such a report was made to the authorities, then a letter would be sent within 15 days after the incident giving specific details of what happened, how it was cleaned up and what preventive measures were taken to keep it from happening again.

SUBPART E
MANIFEST SYSTEMS, RECORDKEEPING AND REPORTING

265.70 - Applicability

These manifest rules apply to all shipments of hazardous waste.

265.71 - Use of the Manifest System

Manifest must be supplied for each hazardous waste shipment. The disposal facility must be designated on this manifest. In addition, the manifest must have the following information: 1) an individual manifest number, 2) generator's name, mailing address, telephone number and EPA I.D. number, 3) the name and EPA I.D. number of each transporter involved, 4) the name, address and EPA I.D. number of the designated disposal facility, 5) a description of the waste, including the information supplied in the 265.13 Table, 6) total quantity and units of weight or volume of the waste.

The following certification must appear on the manifest. "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the D.O.T. and EPA.

There must be enough copies of the manifest so that each transporter and the disposal facility will have their own individual copy. In addition, there must be one extra copy which will show a signature from each transporter and from the disposal facility which must be mailed back to the hazardous waste generating plant.

262.30 - Pre-Transport Requirements

If drums are used for disposal, they must meet DOT designation 17E or higher restrictions. The barrel used may be marked "STC" or "NRC." Plants which treat with Chemonite receive their copper in DOT 17H drums which can be reused.

Each barrel must be labeled when it is filled. Commercial labels are acceptable and must be completly filled out and dated when the barrel is filled. Barrels should be inspected weekly.

262.34

Barrels may not be stored for more than 90 days from the time they are filled. All plants must ship out their wastes which have been held for more than two and one-half months, in order to meet this three-month deadline. Multiple plant shipments are encouraged to make the best use of our trucking facilities.

262.40 - Recordkeeping

As generators, we must keep all signed copies of manifests and reports to the EPA for at least three years. In addition, all test results, waste analyses, etc., must be kept for a period of three years. If there is any governmental enforcement action against any particular shipment, the records for that shipment must be kept for three years after a settlement is reached.

Any generator who ships off-site hazardous waste may be required to submit an annual report to the EPA, due by March 1 of the following year, for that year's shipments of hazardous wastes. Copies of these reports are to be kept a minimum of three years.

If you do not receive a signed copy from the disposal facility for shipment of waste materials sent them within 45 days, an exception report must be filed with the EPA which includes a copy of the producer copy of the manifest and a cover letter explaining the effort taken to locate either the waste or the manifest signed by the disposal site.

In order to avoid unnecessary EPA involvement, if you have not received the signed copy of your manifest from the disposal site within 35 days after it was shipped, please notify this office.

Because most of our shipments are shipped on a company truck, a copy of the manifest should be filled out and signed to cover the transportation step and disposal step which can be returned to the plant via company mail.

SUBPART F
GROUNDWATER MONITORING

265.90 - Applicability

Because J. H. Baxter's plants do not have surface impoundments, landfills or land treatment facilities used to manage hazardous wastes, they are not require to have a groundwater monitoring program. This also includes the Union Pacific's plant at The Dalles, Oregon.

SUBPART G
CLOSURE AND POST-CLOSURE

265.112 - Closure Plan

A closure plan has been prepared for this facility and is attached.

SUBPART I
USE AND MANAGEMENT OF CONTAINERS

265.171

Containers or drums used for hazardous waste must be in good condition. In addition, they must meet DOT designation 17E or higher restrictions. The barrel used may not be marked "STC" or "NRC." Each barrel must be labeled when it is filled. Commercial labels are acceptable and must be completely filled out and dated when the barrel is filled.

Barrels may not be stored for more than 90 days from the time they are filled and the plant does not have an approved storage facility. As of October 1981, the only J. H. Baxter plant to have such a facility is the Eugene plant. All other plants must ship out their wastes which have been held for more than two and one half months in order to meet this three-month deadline.

265.174 - Inspection

Containers holding hazardous wastes must be inspected weekly and the inspection noted on the plant inspection report. Leaks or other problems must be corrected or the barrels replaced.

SUBPART J
TANKS

Hazardous wastes as such are not generally stored in tanks on J. H. Baxter's plants. If there are wastes in the tanks, they are in process and are not considered wastes at that point. Nevertheless, these tanks are protected by diking the tank farms, routine maintenance and careful training of employees.

SUBPART K
SURFACE IMPOUNDMENTS

Surface impoundments should have a two-foot free board as a reserve capacity against accidental spillage or over filling. J. H. Baxter does not have any surface impoundments. The ponds at the Union Pacific Railroad plant at Laramie are surface impoundments.

265.223

Earthen dikes should have protective coverage, such as grass.

265.226 - Inspections

The free board level should be checked at least once a day and the integrity of the dikes and vegetation on the dike should be checked weekly. Both inspections should be entered on the plant inspection report.

265.228 - Closure and Post-closure

This subject is covered in the closure plans.

At a plant that has more than one impoundment, separate monitoring systems for each impoundment are not required if a single detection system will detect any contamination problem. If a facility has only one surface impoundment, the waste management area which must be monitored is the perimeter of the pond, landfill or land treatment area. In the case of a facility having more than one surface impoundment, the boundary is an imaginary line which circumscribes the various ponds or landfills or land treatment areas.

All monitoring wells must be sealed with Bentonite or cement to prevent contamination of the groundwater down the bore hole.

265.92 - Sampling and Analysis

The owner/operator of a site must establish a plan which will include the procedures and techniques for:

1. Sample collection.
2. Sample preservation and shipment.
3. Analytical procedures
4. Chain of custody control.

It is our understanding that the Union Pacific Railroad will handle the actual sampling and analysis of the groundwater monitoring system.

Quarterly parameters required for establishing groundwater monitoring system:

1. Chloride
2. Iron
3. Manganese
4. Phenols
5. Sodium
6. Sulfate
7. Elevation of groundwater in the well.

Quarterly parameters required for indicators as groundwater contamination are:

1. pH
2. Specific conductance
3. Total organic carbon (TOC)
4. Total organic halogen (TOH)

In addition, the background of concentration of values of the following parameters must be done on a quarterly basis. These parameters are the EPA Interim primary drinking water standards. They are as follows:

Arsenic	.05 maximum milligrams per liter
Barium	1.0
Cadmium	.01

SUBPART L
WASTE PILES

Hazardous wastes are not stored in piles.

SUBPART M
LAND TREATMENT

The Company is not engaged in any land treatment operation of hazardous waste.

SUBPART N
LANDFILLS

The Company is not engaged into land filling on company property of any hazardous waste.

SUBPART O
INCINERATORS

The Company does not incinerate any hazardous wastes.

SUBPART P
THERMAL TREATMENT

The Company does not engaged in any thermal treatment of hazardous wastes.

J. H. BAXTER & CO.
RCRA WATER POLLUTION CHECKLIST
"DAILY INSPECTION"

Plant _____ Month _____ Year _____

Water Pollution Equipment	Day 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	3
Settling Basin Pump Operation																															
Oil Skimmer Operation																															
Leaks Pumps																															
[redacted] s																															
Emulsion																															
High Water Alarm Test																															
Ponds Operation Pumps																															
Pond Level																															
2' Minimum Freeboard																															
Dikes - Vegetation																															
[redacted]																															
Daily Initial																															

NOTE: / denotes operation O.K. — Number each operating problem, write corresponding explanation under comments on reverse side.

_____ _____

Plant Manager

J. H. BAXTER & CO.
RCRA TREATING CHECKLIST
"DAILY INSPECTION"

Plant _____ Month _____ Year _____

Treating Room Equipment	Day 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	3
Leaks Pumps																														
Lines																														
Valves																														
Cylinder Baskets																														
Unloading Dikes																														
Leaks Pumps																														
Lines																														
SPCC Dikes																														
Leaks Pumps																														
Lines																														
Dike Drain Valve Locked																														
Boiler Chemical Leaks																														
Condensate Return																														
Daily Initial																														

NOTE: / denotes operation O. K. — Number each operating problem, write corresponding explanation under comments on reverse side.

_____ Inspector

_____ Plant Manager

J. H. BAXTER & CO.
RCRA CHECKLIST

Plant _____ Month _____ Year ____

Equipment	Day 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
Daily Initial																														

Check (✓) if equipment operation O.K. -- Number each operating problem, write corresponding explanation under comments on reverse side.

Hazardous Waste Container Record

Container Serial No.	Fill Dates		Contents	Quantity (Wt. or Vol.)	Comments (Ship Date, Manifest No., etc.)
	Start	Filled			

A-3

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

J. H. BAXTER & CO. ARLINGTON TREATING PLANT
WOOD PRESERVING PLANT
188 ST. NE & 66 AVE. NE
ARLINGTON, WASHINGTON

OWNED AND OPERATED

BY

J. H. BAXTER & CO.
1700 SO..EL CAMINO REAL
SAN MATEO, CALIFORNIA 94402

DESIGNATED PERSON ACCOUNTABLE
FOR OIL SPILL PREVENTION
AT FACILITY IS

M. C. SPIES

MANAGEMENT APPROVAL

THIS SPCC PLAN WILL BE IMPLEMENTED
AS HEREIN DESCRIBED

SIGNED L. G. Hope

L. G. HOPE
VICE PRESIDENT-OPERATIONS

CERTIFICATION

I hereby certify that I have examined the facility and being familiar with the provisions of the 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

Signed: Charles W Best

C. W. BEST
REGISTERED PROFESSIONAL
ENGINEER
REG. NO. CH1492 CALIF.

Reviewed by: Joe Morgan III

JOE MORGAN III
TECHNICAL DIRECTOR

August 7, 1981
Date

SPCC PLAN FOR
ARLINGTON, WASHINGTON, TREATING PLANT

GENERAL INFORMATION

Butt Treating Operation:

Operation for

Tank No.	Volume in Gallons	Use and Contents
1	18,000	Empty - Not Used
2	9,000	Emergency Overflow
3	11,000	Empty - Not Used
4	20,000	Pentachlorophenol in Medium Aromatic Oil
5	20,000	Pentachlorophenol in Medium Aromatic Oil
6	20,000	Pentachlorphenol in Medium Aromatic Oil
	60,000	Total Used Volume

The three active tanks are inside an approximately 45,000 gallon spill containment tank farm. This farm has a concrete floor with a built-in sump for pumping purposes. The containment area overflows into an additional containment pit with another approximate 10,000 gallon storage capacity.

The facility is frequently inspected during the normal hours of daily treating operations for leaks, equipment problems and spills. The attached spill reporting procedure will be posted in the treating room.

Pressure Treating Operation:

Will start operation in mid-september 1981.

Tank No.	Volume in Gallons	Use and Contents
7	85,000	Cone bottom, Pentachlorophenol in Medium Aromatic Oil, Work Tank

Tank No.	Volume in Gallons	Use and Contents
8	85,000	Cone Bottom, Medium Aromatic Oil Storage
9	9,000	Penta-Oil Mix Tank
10	20,000	Diesel Fuel Standby Storage, #4 oil
11	20,000	Process Water Storage - Oil Separation
12	1,000	Oil-Water Decant Separator
	220,000	

These tanks are inside an approximately 500,000 gallon spill containment tank farm. The farm has a concrete floor with a built-in sump for pumping purposes. In addition, the plant could use the 54,000 gallon capacity of the treating cylinder for extra storage in an emergency.

Personnel briefings are made monthly, or more often as needed. All employees have attended lectures stressing the importance of leak and spill prevention.

The facility is frequently inspected during the normal course of daily treating operations for leaks, equipment problems and spills. The attached spill reporing procedure will be posted in the treating room.

FACILITY DRAINAGE

Diked area drainage is accomplished by moving a portable pump to the sump in a containment area and pumping the oil-free water to the normal yard storm drainage system. This is done after removal of all oil by an oil skimmer, as needed. The treating supervisor will be in charge of this operation.

TANK SAFETY

Tank design and materials of construction meet either API or ASME criteria. No corrosion allowance is needed.

Tank inspection records are kept in the operating engineer's log which details changes in tank contents. A record is kept of the weekly inspections.

Internal heating coil leakage is controlled by continual observation, since all condensate from the coils goes through an optical monitor prior to being returned to the boiler.

FACILITY TRANSFER OPERATIONS

Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or no steady service for extended periods.

Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. Pipe supports include metal cradles, swing supports and wooden cradles. The operating engineer on duty is constantly observing pipelines in the course of his normal duties. All of our major pipelines are above ground.

Pipelines are so situated that moving vehicles do not get near them.

RECEIVING AND LOADING OUT OILS

Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation.

The receiving area is so arranged that any spills drain into the containment area that serves the retort and tank farm.

Tank cars are protected by locked switches and a derail during loading or unloading. Tank trucks have their wheels blocked during loading and unloading.

All drains and outlets on tank cars and tank trucks are checked for leakage before loading or unloading is started and again after completion and before departure.

SECURITY

All valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. Starter controls on all oil pumps in non-operating or standby status are locked in the off position or located at sites accessible only to authorized personnel.

The plant is not fenced. During the weekends and other periods when the plant is shut down, critical valves are locked closed and all doors that give access to controls are shut and locked.

Lights are so situated in the pump room, boiler room and tank farm area that visibility is good enough at all times to see spills.

specifies the percentage of duplicate or spike samples to be run on a routine basis. All lab results including quality assurance should be included in a permanently bound lab notebook. This notebook should also include information on equipment maintenance and calibration.

SUBPART G
CLOSURE AND POST CLOSURE

265.112 - Closure Plan

A closure plan has been prepared for this facility and is attached.

SUBPART I
USE AND MANAGEMENT OF CONTAINERS

265.171

Containers or drums used for hazardous waste must be in good condition. In addition, they must meet DOT designation 17E or higher restrictions. The barrel used may be marked "STC" or "NRC." Each barrel must be labeled when it is filled. Commercial labels are acceptable and must be completely filled out and dated when the barrel is filled.

Barrels may not be stored for more than 90 days from the time they are filled and the plant does not have an approved storage facility. As of October 1981, the only J. H. Baxter plant to have such a facility is the Eugene plant. All other plants must ship out their wastes which have been held for more than two and one half months in order to meet this three-month deadline.

265.174 - Inspection

Containers holding hazardous wastes must be inspected weekly and the inspection noted on the plant inspection report. Leaks or other problems must be corrected or the barrels replaced.

SUBPART J
TANKS

Hazardous wastes as such are not generally stored in tanks on J. H. Baxter's plants. If there are wastes in the tanks, they are in process and are not considered wastes at that point. Nevertheless, these tanks are protected by diking the tank farms, routine maintenance and careful training of employees.

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EMERGENCY EQUIPMENT LIST (RCRA) 1982

J. H. Baxter & Co., Arlington, Wa.

1. Sorbent Blanket - Stored in boiler room at Treating Plant.

2. Respiratory Equipment - Two units located in Treating Control Room.

3. First-Aid Kits (Stations)
   - A. One kit in yard office
   - B. One kit in main office
   - C. One kit in shop
   - D. One kit in treating control room
   - E. One kit in framing building
   - F. One kit in shaver talley building
   - G. One kit in employee lunch room.

4. Protective Clothing
   - A. Gloves - Rubber gloves for treating engineers use located in treating control room and yard office.
   - B. Rain Suits & Waders - Two each located in butt treating area.

5. Fire Fighting Equipment
   - A. Alarm System - On site alarm only - located at shaving machine.
   - B. Fire Hydrants - One located at shaver
     One located at yard office.
     Also water available from city located in boiler room with fire hose hook-up at northeast end of boiler room.
   - C. Fire Hose -
     1. 400 feet located at shaver - 2"
     2. 300 feet located at yard office near butt tank - 2".
     3. 50' - boiler room - 1½".
   - D. Heat Sensitive Foam System - Located at shaver only.
   - E. Fire Extinguishers (Checked monthly)
     1. One located in main office
     2. One located in yard office
     3. One located in lab near yard office

4. One located in shaver control room
5. One located in shaver cab
6. One located in shaver talley building
7. One located in framing building
8. One located in employee lunch room
9. One located in treating control room
10. Two located in boiler room - one at the east door entance and one at the south entrance
11. One located in tank farm
12. One located in pit below retort
13. One located in shaver truck
14. Five - one each on ~~four~~ five pettibones & one on patrick
15. Two - one located on each of two yard pick-ups
16. One located on crane
17. One located in shop
18. One located in garage

6. Portable Pump - Gasoline operated, diaphragm type - located in shop

7. Disposal Drums - Meets DOT minimum 17-E designation
   A. Located in butt treat tank farm contained area
   B. Located in pressure treat tank farm contained area

8. Telephone & Portable Carry Radios (Dial 911 for police & ambulance' dial 435-3333 for fire).
   A. Telephones - 1 located at treating control room, 1 located at shop, 2 located at yard office, several at main office
   B. Carry Radios - Base located at main office, 1 carried by yard ~~foreman~~ SAFETY OFFICER, 1 carried by treating supervisor, 1 ~~located at shaver~~ CARRIED BY MAINT., 1 located at framing building, 1 CARRIED BY ASST PLANT MGR.

9. Miscellaneous (Hand tools, shovels, etc.) - Located throughout all areas of plant.

10. Miscellaneous Emergency Equipment
    A. Blanket located at yard office
    B. Two stretchers located in shop storage building.

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RESPIRATORY PROCEDURES FOR SELECTION AND USE OF RESPIRATORS

1. The chin style gas mask and canister has been choosen for its easier and greater maneuverability in confined spaces, such as retorts.

2. This canister type mask operates on the principle of chemical absorption of mechanical filtration. Contaminated air is purified by chemicals in the canister, pure air is not supplied.

3. Canister type masks do not provide protection against oxygen deficiency.

4. The canisters provided are for organic vapors protection only. They cannot be used for other gases, (carbon monoxide) or particulates, (dusts, fumes, mists, fogs or smokes).

5. Proper Use of Canister Masks.
   a.) Mask must be thoroughly inspected and found in safe condition before use.
   b.) Hats should be removed. The mouth shall be cleared of tobacco, etc., before adjusting mask to head.
   c.) Mask must be tight, there should be no leaks around the face piece.
   d.) The wearer should advance cautiously into the contaminated air, and if leakage is noted as evidenced by odor, taste or eye irritation, he should return to fresh air immediately and ascertain the cause.
   e.) In attaching new canister, make sure gasket is in place and that connections are air tight.
   f.) Mask must be cleaned and sterilized after each use and put into condition for use again. Wash in warm soapy water and rinse well in clear water.